EXHIBIT E

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

SAMUEL G. BREITLING AND	§	
JO ANN BREITLING,	§	
	§	
Plaintiffs,	§	
	§	
vs.	§	**Case No. 3:15-CV-00703-B**
	§	
LNV CORPORATION et al;	§	
CODILIS & STAWIARSKI P.C.;	§	
UNKNOWN DOES 1-50;	§	
	§	
Defendants.	§	

DECLARATION OF JASON L. SANDERS

1. "My name is Jason L. Sanders. I am of sound mind and capable of making this unsworn declaration pursuant to 28 U.S.C. § 1746. I am over the age of twenty-one (21) years, have never been convicted of a felony or crime involving dishonesty and am fully competent to testify to the matters herein.

2. I am an attorney with Sanders Collins PLLC, and am one of the attorneys of record for LNV Corporation ("LNV") in this matter. In my capacity as counsel of record for LNV, I have personal knowledge of the facts contained herein and know these facts to be true and correct. I am providing this Declaration in support of LNV's Motion for Sanctions for Bad Faith, Unreasonable, and Vexatious Conduct. I supervised the work of the attorneys and paralegals who assisted with LNV's defense in this case.

3. I am duly licensed to practice law in the State of Texas. Attached hereto and incorporated by reference as **Exhibit E-1** is a true and correct copy of my law firm resume. I served as a judicial law clerk to Justice Miriam Shearing on the Supreme Court of Nevada from

approximately August 2002 - August 2003. After my clerkship, I joined the law firm of Locke Liddell & Sapp LLP in 2003, became a partner in 2011, and practiced continually with the firm, which is now known as Locke Lord LLP ("Locke Lord"), until February 15, 2017. On February 16, 2017, I started Sanders Collins PLLC at which I am currently a member.

4. I am admitted to practice law in the states of Texas, Arizona, California, and New York. I am also admitted in the United States Supreme Court, United States Court of Appeals for the 1st, 5th, 8th, and 9th Circuits, and the United States District Courts for the District of Arizona, Central, Northern, and Southern Districts of California, Western District of Michigan, and the Northern, Southern, Eastern, and Western Districts of Texas.

5. My law practice has consisted of a wide range of litigation, including, without limitation, consumer finance, class action, franchise, construction, and Employee Retirement Income Security Act of 1974 litigation. I have handled hundreds of litigation cases in state and federal district courts in Texas and in other states throughout the United States. I worked for a state supreme court justice for approximately a year, have practiced law for over 13 years, and possess the requisite skill and experience to properly perform the legal services rendered in this matter.

6. Marc Cabrera regularly assisted me in this matter. Attached hereto and incorporated by reference as **Exhibit E-2** is a true and correct copy of Mr. Cabrera's firm resume. Mr. Cabrera is licensed to practice law in Texas, New York, the United States Court of Appeals for the 5th Circuit, and all United States District Courts in Texas. I was one of Mr. Cabrera's mentors when he was a summer associate with Locke Lord in 2008. Mr. Cabrera started as an associate with Locke Lord in January 2010. I consistently worked with Mr. Cabrera from January 2010 until I left Locke Lord in February 2017. While working with Mr. Cabrera, I have had the

opportunity to observe his capabilities and growth as an attorney. Mr. Cabrera has practiced law for over 7 years and possesses the requisite skill and experience to properly perform the legal services rendered in this matter.

7. Mr. Cabrera's law practice has consisted of the representation of banks, lenders, servicers, and investors in numerous consumer finance litigation cases in state and federal district courts in Texas involving, without limitation, claims for wrongful foreclosure, breach of contract, fraud, violations of unfair and deceptive practices statutes, and violations of various federal statutes, including, without limitation, the Truth in Lending Act, Real Estate Settlement Procedures Act, and Fair Debt Collection Practices Act.

8. The services provided in this matter for which LNV seeks recovery of its attorney's fees in the Motion for Sanctions are as follows:

- Addressing and responding to Samuel and Jo Ann Breitlings' refusal to comply with the Court's orders regarding the amended complaint.
- Addressing and responding to the collateral attack on a state court judgment.
- Addressing and responding to the motions to consolidate.
- Addressing and responding to the motion to remand and challenge of the Court's jurisdiction.
- Addressing and responding to the meritless motions to disqualify.
- Analyzing and considering the notices of constitutional questions.

9. In providing the above-listed services, LNV has incurred and paid approximately[1] $32,600 in reasonable and necessary attorneys' fees for which it seeks reimbursement. Mr. Sanders spent 27.3 hours at a rate that varied from $400-$425 an hour for a total of $11,247.50 in attorneys' fees for which LNV seeks payment. Mr. Cabrera spent 65.7 hours at a rate of $325 an hour for a

[1] There are legal fees that LNV incurred for these services for which it is not seeking reimbursement, which emphasizes the reasonableness of the legal fees sought.

total of $21,352.50 in attorneys' fees for which LNV seeks reimbursement. The total hours for which LNV seeks reimbursement is 93 hours with a blended hourly rate of approximately $350.

10. I am familiar with the reasonable and necessary attorneys' fees for prosecuting and defending a case of this nature. The blended rate of approximately $350 and total fees of $32,600 charged by Locke Lord in this matter for which LNV seeks recovery are reasonable, particularly in relation to comparable large law firms in Texas. *See, e.g., NSEW Holdings LLC v. Wells Fargo Bank, N.A.,* Civil Action No. 4:15-CV-828, 2017 WL 1030313, at *7 (E.D. Texas March 17, 2017) (finding Jason Sanders' rate of $439 reasonable and rates from $258-$569 reasonable); *Western Healthcare, LLC v. Nat'l Fire and Marine Ins. Co.*, No. 3:16-cv-565-L, 2016 WL 7735761, at *7 (N.D. Tex. December 28, 2016) (finding hourly rate of $500 per hour for both a 1998 and 2000 law school graduate reasonable). The rates charged by Locke Lord in this matter are also consistent with the rates charged by Locke Lord in similar matters in which Locke Lord represents LNV.[2]

11. In my opinion, based upon my experience as a licensed attorney, the legal services, which I or Mr. Cabrera performed, were and are normal, reasonable, customary, and necessary to properly represent LNV. The hourly rate charged for the services performed was and is reasonable for the work performed in Texas. The total number of hours worked for which LNV is seeking reimbursement from Samuel Breitling and Jo Ann Breitling was and is reasonable.

12. The invoices which evidence the work done on this matter (the "Invoices") are attached as **Exhibit E-3**, and contain entries setting forth the date the work was done, the attorney

[2] I recognize that there are certain Judges who have reduced associate rates to $300 and below. I nonetheless believe that the rates charged in this case are normal, reasonable, customary, and necessary, particularly given the blended rate of $350 and relatively nominal amount of fees LNV seeks.

conducting the work, a narrative description of the work that was performed, the number of hours it took to complete the described work, and the total value of that work that was billed.

13. The Invoices have been redacted as they contain narrative descriptions that disclose work product information and attorneys' mental impressions and also reveal attorney-client communications. LNV does not wish to waive any work product or attorney-client privileges, and thus, has redacted portions of the narrative descriptions contained in the Invoices to preserve those privileges.

14. The Invoices were made at or near the time of the acts, events, conditions, and/or opinions recorded from information transmitted by persons with knowledge of the matters set forth therein, and the Invoices were kept in the course of regularly conducted business activity of Locke Lord and it is the regular practice of the business activity of Locke Lord to make the Invoices.

15. I am employed as an attorney for LNV, and thus I am not receiving any additional compensation for my testimony."

16. Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

Date: March 29, 2017

Jason L. Sanders

EXHIBIT E-1

SANDERS COLLINS
HOME (/)
FIRM (/ABOUT-4/)
LAWYERS (/LAWYERS/)
PRACTICE AREAS (/PRACTICE-AREAS/)
RESULTS (/MOREAU/)
CONTACT (/NEW-PAGE-2/)
The Lawyers
TRUSTED ADVISORS | PASSIONATE ADVOCATES

Jason Sanders

CONTACT

Direct: (469) 640-6304 jsanders@sanderscollins.com (mailto:jsanders@sanderscollins.com)

OVERVIEW

Jason Sanders was an equity partner at one of the largest international law firms in Texas. After clerking for the Supreme Court of Nevada for a year and practicing law for more than 13 years, Jason elected to leave his law firm to start Sanders Collins PLLC. Jason's practice focuses on complex business related and financial services litigation. Jason has tried more than 20 cases in state court, federal court, and arbitration. Jason has litigated cases all over Texas and in Arizona, Arkansas, California, Georgia, Iowa, Massachusetts, Michigan, Nevada, New Jersey, Pennsylvania, Washington, and Wyoming. He has also handled appeals in state and federal court. From 2009-2015, Texas Monthly and Law & Politics Magazine named Jason a "Rising Star."

Some of Jason's experience includes:

- Obtained dismissal of putative nationwide class action in federal court against national bank related to allegations of unlawfully substituting the index used to calculate adjustable rate mortgage loans.
- Obtained dismissal of putative California class action in state court against national bank related to allegations of unlawfully substituting the index used to calculate adjustable rate mortgage loans.
- Defended and settled an Fair Credit Reporting Act ("FCRA") class action in federal court alleging unlawful credit pulls after bankruptcy discharge.
- Secured complete defense arbitration award for national bank in case in which plaintiffs alleged claims for usury, deceptive trade practices, and breach of contract.
- Secured a jury verdict and judgment in a federal jury trial that included actual and punitive damages, costs, and attorney fees against a county officer who assaulted the plaintiff while incarcerated.
- Obtained directed verdict in jury trial in which plaintiff sued multiple energy companies to remove a natural gas pipeline running across plaintiff's property.
- Obtained summary judgment on tort claims and later secured a judgment as a matter of law on a breach of contract claim after factoring company presented its case in trial in an adversary proceeding in bankruptcy court.
- Secured directed verdicts in two jury trials for one of the largest residential property management companies in the United States.
- First-chaired over 15 temporary restraining order and injunction hearings in state and federal court.
- Obtained appointment of a receiver in federal court to liquidate millions of dollars in collateral in multiple states across the United States.
- Prosecuted and defended civil claims on behalf of developers and owners in construction litigation with general contractors, architects, engineers, and subcontractors in Arizona, New Jersey, Pennsylvania, and Texas.
- Defended mortgage lenders and servicers in state and federal court in individual and putative class-action litigation.
- Prosecuted civil claims for mortgage servicers and investors in mortgage-repurchase litigation.
- Defended mortgage lenders, servicers, and investors in breach of contract, tort, TILA, RESPA, SCRA, FDCPA, and FCRA litigation.
- Prosecuted civil claims for mortgage lender and the FDIC in mortgage-fraud litigation.
- Represented REIT in various types of legal disputes.
- Represented entities in mortgage-backed securities litigation.
- Defended insurance companies and third-party administrators in ERISA litigation and prompt-payment arbitration.
- Prosecuted and defended civil claims on behalf of franchisors in franchise litigation.
- Represented entities in cases involving receivers, injunctions, prejudgment writs of attachment, and garnishments.

PROFESSIONAL HISTORY

- Member, Sanders Collins PLLC
- Partner, Locke Lord LLP
- Judicial Law Clerk, Justice Miriam Shearing, Supreme Court of Nevada

PROFESSIONAL AFFILIATIONS

- Member, Stakeholder 100
- Named, Texas Rising Star by *Texas Monthly* magazine (2009-2015)
- Former Patrick E. Higginbotham American Inn of Court, Associate

PUBLICATIONS AND PRESENTATIONS

Speaking Engagement at the 49th Annual William W. Gibson, Jr. Mortgage Lending Institute, in Austin September 17, 2015 and Dallas November 5, 2015

Presented at the 23rd National Conference on Consumer Finance Class Actions & Litigation, July 2015

Borrower Challenges to Foreclosure and Lender Responses, Texas Foreclosure

Manual, Third Edition, 2014

EDUCATION

J.D., with distinction, University of Iowa College of Law

- Member, Black Law Students Association
- Baskerville Moot Court Competition
- Moot Court Board, Student Judge

B.A., *cum laude* with distinction, Sonoma State University

ADMISSIONS

- All Texas State Courts
- All Arizona State Courts
- All California State Courts
- All New York State Courts
- U.S. Supreme Court
- U.S. Court of Appeals for the First Circuit
- U.S. Court of Appeals for the Fifth Circuit
- U.S. Court of Appeals for the Eighth Circuit
- U.S. Court of Appeals for the Ninth Circuit
- U.S. District Court for the Northern District of Texas
- U.S. District Court for the Southern District of Texas
- U.S. District Court for the Eastern District of Texas
- U.S. District Court for the Western District of Texas
- U.S. District Court for the District of Arizona
- U.S. District Court for the Central District of California
- U.S. District Court for the Northern District of California
- U.S. District Court for the Southern District of California
- U.S. District Court for the Western District of Michigan

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EXHIBIT E-2

Locke Lord LLP

Marc Cabrera

Associate

Dallas
T: 214-740-8289

mcabrera@lockelord.com

Overview

Marc Cabrera is an associate in Locke Lord LLP's Dallas office practicing in the areas of consumer finance and business litigation.

Representative Experience

- Representation of mortgage lenders, servicers, and investors in state and federal court.
- Representation of mortgage servicers and investors in mortgage-repurchase litigation.
- Representation of national mortgage lenders in lender liability actions involving breach of contract, tort, TILA, RESPA, and Fair Debt Collection Practices Act allegations.

Professional Affiliations

- Named, Rising Star by *Super Lawyers* magazine (2014-2017)
- Dallas Bar Association
- Dallas Association of Young Lawyers
- Dallas Hispanic Bar Association
- Jesuit College Preparatory School Alumni Association

Practices

Business Litigation & Dispute Resolution

Class Actions

Consumer Finance

SCRA (Servicemembers Civil Relief Act) Practice

Education

J.D., *cum laude*, Southern Methodist University Dedman School of Law, 2009
Dean's List
The National Dean's List
The National Honors Scholar Society
Phi Delta Phi Honors Fraternity
Finalist, OCU Moot Court Competition
CALI Award, Academic Excellence - Contracts I, Contracts II and Criminal Procedure

B.B.A., Southern Methodist University, 2000
SMU Diversity Award
SMU Mustang Award

Admissions

Texas, 2009

Admitted To Practice

U.S. Court of Appeals for the Fifth Circuit

U.S. District Court for the Northern District of Texas

U.S. District Court for the Southern District of Texas

U.S. District Court for the Eastern District of Texas

U.S. District Court for the Western District of Texas

EXHIBIT E-3

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

July 13, 2015
Invoice No.: 1146504

Total amount due for the legal services rendered and expenses incurred in connection with the referenced matter through June 30, 2015 — $11,261.36

[redacted]
RE: Breitling, Samuel G. and Jo Ann

[redacted]

DATE	ATTY	DESCRIPTION	HOURS	VALUE
[redacted]				
06/02/15	JLS	Consideration of Notice of Constitutional Questions; conference [redacted] regarding strategy.	0.80	320.00
[redacted]				
06/03/15	JLS	Work [redacted] regarding Constitutional challenge.	0.10	40.00
[redacted]				

Invoice Date: July 13, 2015
Invoice No.: 1146504
Page: 2

DATE	ATTY	DESCRIPTION	HOURS	VALUE
06/05/15	JLS	Conference with [redacted] regarding constitutional challenge.	0.20	80.00
[redacted]				
06/11/15	MDC	Review affidavit relating to constitutional questions.	0.10	32.50
[redacted]				

DATE	ATTY	DESCRIPTION	HOURS	VALUE
[redacted]				
06/30/15	MDC	Draft response to motion consolidate.	3.10	1,007.50
		TOTAL HOURS	**29.90**	

TOTAL FEES **$10,295.00**

DATE	EXPENSES	VALUE
[redacted]		
	TOTAL EXPENSES	$966.36

TOTAL FEES	$10,295.00
TOTAL EXPENSES	$966.36
TOTAL FEES AND EXPENSES	$11,261.36
TOTAL BALANCE DUE	**$11,261.36**

[redacted]

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

July 13, 2015
Invoice No.: 1146504

REMITTANCE ADVICE

Total amount due for the legal fees and expenses rendered in connection with the referenced matter through June 30, 2015

[redacted]
RE: Breitling, Samuel G. and Jo Ann

Total Fees $10,295.00

Total Expenses.. [redacted]

Total Due this Statement .... [redacted]

REMITTANCE

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

August 17, 2015
Invoice No.: 1153769

Total amount due for the legal services rendered and expenses incurred in connection with the referenced matter through July 31, 2015 — $2,049.37

[redacted]
RE: Breitling, Samuel G. and Jo Ann

[redacted]

DATE	ATTY	DESCRIPTION	HOURS	VALUE
07/01/15	JLS	Review and revise response to motion to consolidate.	0.90	360.00
[redacted]				
07/06/15	MDC	Revise response to motion to consolidate.	0.30	97.50
[redacted]				

DATE	ATTY	DESCRIPTION	HOURS	VALUE
		[redacted]		
07/22/15	MDC	Review amended response to motion to consolidate.	0.20	65.00
[redacted]				
		TOTAL HOURS	**4.70**	
	TOTAL FEES			**$1,782.50**

DATE	EXPENSES	VALUE
[redacted]		
	TOTAL EXPENSES	$266.87

TOTAL FEES	$1,782.50
TOTAL EXPENSES	$266.87
TOTAL FEES AND EXPENSES	$2,049.37
TOTAL BALANCE DUE	**$2,049.37**

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

August 17, 2015
Invoice No.: 1153769

REMITTANCE

REMITTANCE ADVICE

Total amount due for the legal fees and expenses rendered in connection with the referenced matter through July 31, 2015

[redacted]
RE: Breitling, Samuel G. and Jo Ann

Total Fees $1,782.50

Total Expenses $266.87

Total Due this Statement $2,049.37

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

September 18, 2015
Invoice No.: 1162379

Total amount due for the legal services rendered and expenses incurred in connection with the referenced matter through August 31, 2015	$5,224.47

[redacted]
RE: Breitling, Samuel G. and Jo Ann

[redacted]

DATE	ATTY	DESCRIPTION	HOURS	VALUE
[redacted]				
08/02/15	MDC	Review motion to vacate.	0.20	65.00
08/03/15	JLS	Review motion to vacate order; review affidavit of Annie Maria Breitling; [redacted]	1.70	680.00
08/03/15	MDC	Review declaration in support of motion to vacate.	0.10	32.50
[redacted]				
08/10/15	JLS	Review/analyze motion to vacate; review/analyze case law on Rooker Feldman and void judgments; prepare response to motion to vacate.	2.00	800.00
[redacted]				

DATE	ATTY	DESCRIPTION	HOURS	VALUE
08/11/15	JLS	Review and revise response to motion to vacate; [redacted].	1.50	600.00
08/12/15	MDC	Work on response to motion to vacate strategy.	0.40	130.00
[redacted]				
		TOTAL HOURS	**12.70**	

TOTAL FEES **$4,816.75**

DATE	EXPENSES	VALUE
	[redacted]	
	TOTAL EXPENSES	$407.72

TOTAL FEES	$4,816.75
TOTAL EXPENSES	$407.72
TOTAL FEES AND EXPENSES	$5,224.47

TOTAL BALANCE DUE [redacted]

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

September 18, 2015
Invoice No.: 1162379

REMITTANCE ADVICE

Total amount due for the legal fees and expenses rendered in connection with the referenced matter through August 31, 2015

[redacted]
RE: Breitling, Samuel G. and Jo Ann

Total Fees	$4,816.75
Total Expenses	$407.72
Total Due this Statement	**$5,224.47**

REMITTANCE

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]

December 8, 2015
Invoice No.: 1187525

7195 Dallas Parkway
Plano, TX 75024

Total amount due for the legal services rendered and expenses incurred in connection with the referenced matter through November 30, 2015 — $3,451.10

[redacted]

RE: Breitling, Samuel G. and Jo Ann

[redacted]

DATE	ATTY	DESCRIPTION	HOURS	VALUE
[redacted]				
11/14/15	JLS	Begin to review/analyze amended complaint.	0.50	200.00
11/15/15	JLS	Research and anlayze [redacted]; review/analyze amended complaint.	0.50	200.00

[redacted]

DATE	ATTY	DESCRIPTION	HOURS	VALUE
[redacted]				
		TOTAL HOURS	**9.20**	
	TOTAL FEES			**$3,392.00**

DATE	EXPENSES	VALUE
	[redacted]	
	TOTAL EXPENSES	$59.10

TOTAL FEES	$3,392.00
TOTAL EXPENSES	$59.10
TOTAL FEES AND EXPENSES	$3,451.10
TOTAL BALANCE DUE	**$3,451.10**

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

December 8, 2015
Invoice No.: 1187525

REMITTANCE ADVICE

Total amount due for the legal fees and expenses rendered in connection with the referenced matter through November 30, 2015

[redacted]
RE: Breitling, Samuel G. and Jo Ann

Total Fees	$3,392.00
Total Expenses	$59.10
Total Due this Statement	**$3,451.10**

REMITTANCE

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

January 28, 2016
Invoice No.: 1201566

Total amount due for the legal services rendered and expenses incurred in connection with the referenced matter through December 31, 2015 [redacted]

[redacted]
RE: Breitling, Samuel G. and Jo Ann

[redacted]

DATE	ATTY	DESCRIPTION	HOURS	VALUE
12/01/15	MDC	Review motion for leave to file amended complaint and amended complaint.	0.50	162.50
12/02/15	JLS	Review motion for leave; review amended complaint; [redacted].	1.20	480.00
12/02/15	MDC	Review notice of revised constitutional questions.	0.30	97.50
12/02/15	MDC	[redacted] calling Judge's chambers relating to filing of amended complaint.	0.20	65.00
12/04/15	JLS	Review and analyze Judge's orders unfiling Plaintiffs' pleadings; [redacted].	0.30	120.00

[redacted]

DATE	ATTY	DESCRIPTION	HOURS	VALUE
		deadlines and admonishing Plaintiffs; [redacted].		
12/08/15	MDC	Telephone call to clerk regarding deadline to file motion for leave to amend; review order regarding amended complaint.	0.40	130.00
12/09/15	JLS	Correspond regarding Plaintiffs seeking leave to file amended pleading.	0.20	80.00
[redacted]				
12/11/15	MDC	Review motion to reconsider.	0.30	97.50
12/15/15	JLS	Review order denying motion to consolidate; correspond [redacted]; review and analysis of motion for reconsideration.	0.20	80.00
12/15/15	MDC	Draft response to motion to reconsider.	4.30	1,397.50
12/16/15	JLS	Work on response to motion for reconsideration.	0.70	280.00
12/16/15	MDC	Draft response to motion to reconsider.	5.40	1,755.00
[redacted]				
12/17/15	JLS	Review/analyze motion to reconsider; review and revise response to the same; correspond regarding motion for leave and motion to recuse.	2.10	840.00
12/17/15	MDC	Revise response to motion to reconsider.	3.50	1,137.50
12/18/15	MDC	Revise response to motion to reconsider.	0.30	97.50
[redacted]				
12/21/15	MDC	Legal research regarding recusal standards; draft response to motion to recuse.	7.80	2,535.00
[redacted]				

DATE	ATTY	DESCRIPTION	HOURS	VALUE
[redacted]				
12/23/15	JLS	Review/analyze motion to disqualify Judge Boyle; begin to review and revise response to the same [redacted]	0.00	N/C
12/30/15	JLS	Finalize draft of response to motion to recuse; [redacted].	0.60	240.00
		TOTAL HOURS	**73.70**	

TOTAL FEES **$24,930.50**

DATE	EXPENSES	VALUE
	[redacted]	
	TOTAL EXPENSES	$114.47

TOTAL FEES	$24,930.50
TOTAL EXPENSES	$114.47
TOTAL FEES AND EXPENSES	$25,044.97
TOTAL BALANCE DUE	**$25,044.97**

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

January 28, 2016
Invoice No.: 1201566

REMITTANCE ADVICE

Total amount due for the legal fees and expenses rendered in connection with the referenced matter through December 31, 2015

[redacted]
RE: Breitling, Samuel G. and Jo Ann

Total Fees	$24,930.50
Total Expenses	$114.47
Total Due this Statement	**$25,044.97**

REMITTANCE

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

February 12, 2016
Invoice No.: 1205671

Total amount due for the legal services rendered and expenses incurred in connection with the referenced matter through January 31, 2016 — $5,013.79

[redacted]
RE: Breitling, Samuel G. and Jo Ann

[redacted]

DATE	ATTY	DESCRIPTION	HOURS	VALUE
01/05/16	JLS	Review and analyze reply in support of motion to vacate foreclosure judgment.	0.50	200.00
[redacted]				
01/14/16	JLS	Review motion for reconsideration of denial of motion to consolidate; review order denying motion to consolidate.	0.20	80.00
01/14/16	MDC	Review motion to reconsider consolidation denial.	0.30	97.50
[redacted]				

DATE	ATTY	DESCRIPTION	HOURS	VALUE
[redacted]				
01/20/16	MDC	Draft response to motion to reconsider consolidation.	2.40	780.00
[redacted]				
01/21/16	MDC	Revise response to motion to reconsider consolidation.	1.10	357.50
[redacted]				
		TOTAL HOURS	**13.20**	

TOTAL FEES **$4,507.50**

DATE	EXPENSES	VALUE
	[redacted]	
	TOTAL EXPENSES	$506.29

TOTAL FEES	$4,507.50
TOTAL EXPENSES	$506.29
TOTAL FEES AND EXPENSES	$5,013.79
TOTAL BALANCE DUE	**$5,013.79**

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

February 12, 2016
Invoice No.: 1205671

REMITTANCE

REMITTANCE ADVICE

Total amount due for the legal fees and expenses rendered in connection with the referenced matter through January 31, 2016

[redacted]
RE: Breitling, Samuel G. and Jo Ann

Total Fees	$4,507.50
Total Expenses	$506.29
Total Due this Statement	**$5,013.79**

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

March 9, 2016
Invoice No.: 1213074

Total amount due for the legal services rendered and expenses incurred in connection with the referenced matter through February 29, 2016 — $1,268.10

[redacted]
RE: Breitling, Samuel G. and Jo Ann

[redacted]

DATE	ATTY	DESCRIPTION	HOURS	VALUE
02/01/16	JLS	Work on response to motion for reconsideration.	0.20	85.00
02/02/16	JLS	Correspond [redacted] response to motion for reconsideration.	0.10	42.50
02/03/16	MDC	Revise response to motion to reconsider.	0.30	97.50

[redacted]

DATE	ATTY	DESCRIPTION	HOURS	VALUE
[redacted]				
		TOTAL HOURS	**3.40**	
	TOTAL FEES			**$1,265.00**

DATE	EXPENSES	VALUE
	[redacted]	
	TOTAL EXPENSES	$3.10

TOTAL FEES	$1,265.00
TOTAL EXPENSES	$3.10
TOTAL FEES AND EXPENSES	$1,268.10
TOTAL BALANCE DUE	**$1,268.10**

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

March 9, 2016
Invoice No.: 1213074

REMITTANCE

REMITTANCE ADVICE

Total amount due for the legal fees and expenses rendered in connection with the referenced matter through February 29, 2016

[redacted]
RE: Breitling, Samuel G. and Jo Ann

Total Fees	$1,265.00
Total Expenses	$3.10
Total Due this Statement	**$1,268.10**

[redacted]

Locke Lord LLP

Attorneys & Counselors

[redacted]

April 14, 2016
Invoice No.: 1223072

7195 Dallas Parkway
Plano, TX 75024

Total amount due for the legal services rendered and expenses incurred in connection with the referenced matter through March 31, 2016 — $4,539.01

[redacted]
RE: Breitling, Samuel G. and Jo Ann

[redacted]

DATE	ATTY	DESCRIPTION	HOURS	VALUE
03/01/16	MDC	Review order denying motion to disqualify.	0.20	65.00
[redacted]				
03/04/16	MDC	Review order denying motion for reconsideration.	0.10	32.50
[redacted]				
03/10/16	MDC	Review motion to remand.	0.50	162.50
03/11/16	JLS	[redacted] motion to sever/remand and notice of interlocutory appeal.	0.10	42.50
[redacted]				

DATE	ATTY	DESCRIPTION	HOURS	VALUE
03/14/16	JLS	Review/analyze docket and motion to remand [redacted]; review and revise notice of non compliance.	0.70	297.50
03/14/16	MDC	Draft notice of non-compliance with Court order.	2.10	682.50
[redacted]				
03/24/16	MDC	Draft response to motion to sever and remand; perform legal research for response to motion to sever and remand.	5.00	1,625.00
03/25/16	MDC	Revise response to motion to sever and remand.	1.00	325.00
[redacted]				
03/28/16	JLS	Review and revise response to motion to sever and remand.	0.50	212.50
03/29/16	JLS	Correspond regarding filing response to motion to remand; review final version of the same.	0.10	42.50
03/29/16	MDC	Draft order denying motion to sever and remand.	0.10	32.50
03/30/16	JLS	[redacted] response to motion to sever/remand.	0.10	42.50
		TOTAL HOURS	**12.20**	

	TOTAL FEES	**$4,205.00**

DATE	EXPENSES	VALUE
[redacted]		
	TOTAL EXPENSES	$334.01

TOTAL FEES	$4,205.00
TOTAL EXPENSES	$334.01
TOTAL FEES AND EXPENSES	$4,539.01
TOTAL BALANCE DUE	**$4,539.01**

[redacted]

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

April 14, 2016
Invoice No.: 1223072

REMITTANCE ADVICE

Total amount due for the legal fees and expenses rendered in connection with the referenced matter through March 31, 2016

[redacted]
RE: Breitling, Samuel G. and Jo Ann

Total Fees $4,205.00

Total Expenses.. $334.01

Total Due this Statement $4,539.01

REMITTANCE

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

May 16, 2016
Invoice No.: 1232121

Total amount due for the legal services rendered and expenses incurred in connection with the referenced matter through April 30, 2016 — $16,565.17

[redacted]
RE: Breitling, Samuel G. and Jo Ann

[redacted]

DATE	ATTY	DESCRIPTION	HOURS	VALUE
[redacted]				

DATE	ATTY	DESCRIPTION	HOURS	VALUE
[redacted]				
04/14/16	MDC	Review response to notice of non-compliance; review response to co-defendant's motion for leave to supplement summary judgment motion.	0.40	130.00
04/16/16	JLS	Review notice of challenge to jurisdiction; [redacted]	0.20	85.00
[redacted]				

[redacted]

04/25/16	JLS	Begin to review/analyze response to motion to dismiss; [redacted].	0.20	85.00
04/26/16	JLS	Finalize review of response to motion to dismiss; begin work on reply in support of motion to dismiss; [redacted]; review order requiring Plaintiffs' response by April 25th; review notice of noncompliance; evaluate Rule 54(b) language in order dismissing case; consideration of response to objection to federal court jurisdiction.	0.90	382.50
04/26/16	MDC	Review objection to notice of non-compliance; draft reply to response to motion to dismiss.	4.90	1,592.50

DATE	ATTY	DESCRIPTION	HOURS	VALUE
[redacted]				
		TOTAL HOURS	**41.70**	
	TOTAL FEES			**$14,892.50**

DATE	EXPENSES	VALUE
	[redacted]	
	TOTAL EXPENSES	$1,672.67

TOTAL FEES	$14,892.50
TOTAL EXPENSES	$1,672.67
TOTAL FEES AND EXPENSES	$16,565.17
TOTAL BALANCE DUE	**$16,565.17**

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

May 16, 2016
Invoice No.: 1232121

REMITTANCE ADVICE

Total amount due for the legal fees and expenses rendered in connection with the referenced matter through April 30, 2016

[redacted]
RE: Breitling, Samuel G. and Jo Ann

Total Fees	$14,892.50
Total Expenses	$1,672.67
Total Due this Statement	**$16,565.17**

REMITTANCE

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

June 16, 2016
Invoice No.: 1240671

Total amount due for the legal services rendered and expenses incurred in connection with the referenced matter through May 31, 2016 — $1,759.80

[redacted]
RE: Breitling, Samuel G. and Jo Ann

[redacted]

DATE	ATTY	DESCRIPTION	HOURS	VALUE
[redacted]				
05/27/16	JLS	Begin to review/analyze complaint; [redacted].	0.50	212.50
[redacted]				

DATE	ATTY	DESCRIPTION	HOURS	VALUE
05/27/16	MDC	Review amended complaint.	0.40	130.00
05/28/16	MDC	[redacted] in response to amended complaint.	0.20	65.00
05/29/16	MDC	Work on amended complaint response [redacted].	0.20	65.00
05/31/16	JLS	Finalize review of amended complaint; review motion for clarification; [redacted].	1.20	510.00
		TOTAL HOURS	**4.10**	

TOTAL FEES **$1,582.50**

DATE	EXPENSES	VALUE
	[redacted]	
	TOTAL EXPENSES	$177.30

TOTAL FEES	$1,582.50
TOTAL EXPENSES	$177.30
TOTAL FEES AND EXPENSES	$1,759.80
TOTAL BALANCE DUE	**$1,759.80**

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

June 16, 2016
Invoice No.: 1240671

REMITTANCE ADVICE

Total amount due for the legal fees and expenses rendered in connection with the referenced matter through May 31, 2016

[redacted]
RE: Breitling, Samuel G. and Jo Ann

Total Fees	$1,582.50
Total Expenses	$177.30
Total Due this Statement	**$1,759.80**

REMITTANCE

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]

July 12, 2016
Invoice No.: 1246767

[redacted]
7195 Dallas Parkway
Plano, TX 75024

Total amount due for the legal services rendered in connection with the referenced matter through June 30, 2016 $7,387.50

[redacted]
RE: Breitling, Samuel G. and Jo Ann

[redacted]

DATE	ATTY	DESCRIPTION	HOURS	VALUE
[redacted]				
06/02/16	MDC	[redacted] research regarding constitutional challenge procedure.	0.70	227.50
06/03/16	JLS	[redacted] regarding procedural Vehicle For Raising Constitutional Challenges.	0.20	85.00
[redacted]				
06/03/16	MDC	Telephone call to clerk regarding amended	0.40	130.00
[redacted]				

DATE	ATTY	DESCRIPTION	HOURS	VALUE
[redacted]				
06/05/16	JLS	[redacted] regarding notice of constitutional challenge.	0.10	42.50
06/07/16	JLS	Begin to review and revise motion to strike and motion to dismiss.	0.10	42.50
06/07/16	MDC	Draft motion to dismiss amended complaint.	4.90	1,592.50
06/08/16	JLS	Work on motion to dismiss; analyze debt collection case law.	1.10	467.50
06/08/16	MDC	Revise motion to dismiss.	0.80	260.00
06/09/16	JLS	Work on motion to dismiss issue.	0.30	127.50
06/09/16	MDC	Revise motion to dismiss.	1.30	422.50
06/10/16	JLS	Review final and filed motion to dismiss; [redacted].	0.40	170.00
06/10/16	MDC	Review foreclosure counsel's motion to strike.	0.10	32.50

[redacted]

DATE	ATTY	DESCRIPTION	HOURS	VALUE
[redacted]				
06/25/16	MDC	Review response to co-defendant's motion to strike and response to motion to dismiss.	0.30	97.50
[redacted]				
		TOTAL HOURS	**21.00**	

TOTAL FEES	**$7,387.50**
TOTAL BALANCE DUE	**$7,387.50**

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]

July 12, 2016
Invoice No.: 1246767

[redacted]
7195 Dallas Parkway
Plano, TX 75024

REMITTANCE

REMITTANCE ADVICE

Total amount due for the legal fees and expenses rendered in connection with the referenced matter through June 30, 2016

[redacted]
RE: Breitling, Samuel G. and Jo Ann

Total Fees $7,387.50

Total Due this Statement $7,387.50

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

August 12, 2016
Invoice No.: 1257251

Total amount due for the legal services rendered and expenses incurred in connection with the referenced matter through July 31, 2016 — $1,362.90

[redacted]
RE: Breitling, Samuel G. and Jo Ann

[redacted]

DATE	ATTY	DESCRIPTION	HOURS	VALUE
07/03/16	MDC	Draft reply in support of motion to dismiss.	1.00	325.00
07/04/16	MDC	Work on reply in support of motion to dismiss strategy.	0.20	65.00
07/06/16	JLS	Review reply in support of motion to dismiss; [redacted].	0.20	85.00
07/06/16	MDC	Revise reply in support of motion to dismiss.	0.10	32.50
07/07/16	JLS	[redacted] regarding reply in support of motion to dismiss.	0.10	42.50
07/07/16	MDC	Revise reply in support of motion to dismiss.	0.20	65.00

[redacted]

Invoice Date: August [illegible] 2016
Invoice No.: 1257251
Page: 2

DATE	ATTY	DESCRIPTION	HOURS	VALUE
[redacted]				
		TOTAL HOURS	**3.70**	
	TOTAL FEES			**$1,362.50**

DATE	EXPENSES	VALUE
	[redacted]	
	TOTAL EXPENSES	$0.40

TOTAL FEES	$1,362.50
TOTAL EXPENSES	$0.40
TOTAL FEES AND EXPENSES	$1,362.90
TOTAL BALANCE DUE	**$1,362.90**

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

August 12, 2016
Invoice No.: 1257251

REMITTANCE

REMITTANCE ADVICE

Total amount due for the legal fees and expenses rendered in connection with the referenced matter through July 31, 2016

[redacted]
RE: Breitling, Samuel G. and Jo Ann

Total Fees $1,362.50

Total Expenses $0.40

Total Due this Statement $1,362.90

[redacted]

Locke Lord LLP

Attorneys & Counselors

[redacted]

7195 Dallas Parkway
Plano, TX 75024

September 20, 2016
Invoice No.: 1266771

Total amount due for the legal services rendered and expenses incurred in connection with the referenced matter through August 31, 2016 — $4,012.91

[redacted]

RE: Breitling, Samuel G. and Jo Ann

[redacted]

DATE	ATTY	DESCRIPTION	HOURS	VALUE
[redacted]				
08/03/16	MDC	Review second motion for disqualification; review order denying same.	0.30	97.50
08/10/16	JLS	Review/analyze order dismissing lawsuit; review/analyze final judgment; consideration of res judicata impact of ruling; [redacted]	0.70	297.50

[redacted]

DATE	ATTY	DESCRIPTION	HOURS	VALUE
[redacted]				
		TOTAL HOURS	**10.90**	
	TOTAL FEES			**$3,800.40**

DATE	EXPENSES	VALUE
	[redacted]	
	TOTAL EXPENSES	$212.51

TOTAL FEES	$3,800.40
TOTAL EXPENSES	$212.51
TOTAL FEES AND EXPENSES	$4,012.91
TOTAL BALANCE DUE	**$4,012.91**

[redacted]

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

September 20, 2016
Invoice No.: 1266771

REMITTANCE

REMITTANCE ADVICE

Total amount due for the legal fees and expenses rendered in connection with the referenced matter through August 31, 2016

[redacted]
RE: Breitling, Samuel G. and Jo Ann

Total Fees	$3,800.40
Total Expenses	$212.51
Total Due this Statement	**$4,012.91**

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

October 28, 2016
Invoice No.: 1277450

Total amount due for the legal services rendered and expenses incurred in connection with the referenced matter through September 30, 2016	$5,387.30

[redacted]

RE: Breitling, Samuel G. and Jo Ann

[redacted]

DATE	ATTY	DESCRIPTION	HOURS	VALUE
[redacted]				
09/08/16	MDC	Review motion to alter judgment;	0.20	65.00
09/12/16	JLS	[redacted] regarding responses to Plaintiffs' recently motions; analyze Rule 52 motion, Rule 59 motion, and motion to unseal certain documents; analyze Rule 52 and case law interpreting Rule 52.	1.50	637.50
09/14/16	JLS	Work on response to motion for new trial; [redacted]	0.60	255.00
09/14/16	MDC	Draft response to Rule 59 (e) motion.	1.10	357.50

[redacted]

DATE	ATTY	DESCRIPTION	HOURS	VALUE
09/16/16	MDC	Revise response to Rule 59(e) motion.	3.00	975.00
09/17/16	JLS	Begin to review and revise Response in Opposition to Motion to Amend Orders.	0.40	170.00
09/18/16	MDC	Review Rule 52 motion; draft response to Rule 52 motion.	2.70	877.50
09/19/16	JLS	Review and revise responses to Rule 52 and Rule 59 motions research and analyze appeal of interlocutory orders after final judgment.	1.80	765.00
[redacted]				
09/19/16	MDC	Revise response to Rule 52 motion.	1.00	325.00
09/21/16	JLS	Review/analyze Defendant Codilis & Stawiarski, P.C.'s Response in Opposition to Plaintiffs' Rule 52 Motion and Rule 59 Motion.	0.10	42.50
09/22/16	MDC	Revise response to Rule 52 and 59 motions; draft order denying Rule 52 and Rule 59 motions.	0.80	260.00
09/23/16	JLS	[redacted] filed combined Rule 52 Motion and Rule 59 Motion response [redacted].	0.10	42.50
		TOTAL HOURS	**15.00**	

TOTAL FEES **$5,385.50**

DATE	EXPENSES	VALUE
	[redacted]	
	TOTAL EXPENSES	$1.80

TOTAL FEES	$5,385.50
TOTAL EXPENSES	$1.80
TOTAL FEES AND EXPENSES	$5,387.30
TOTAL BALANCE DUE	**$5,387.30**

[redacted]

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]

October 28, 2016
Invoice No.: 1277450

[redacted]
7195 Dallas Parkway
Plano, TX 75024

REMITTANCE

REMITTANCE ADVICE

Total amount due for the legal fees and expenses rendered in connection with the referenced matter through September 30, 2016

[redacted]
RE: Breitling, Samuel G. and Jo Ann

Total Fees	$5,385.50
Total Expenses	$1.80
Total Due this Statement	**$5,387.30**

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]

November 7, 2016
Invoice No.: 1279247

[redacted]
7195 Dallas Parkway
Plano, TX 75024

Total amount due for the legal services rendered in connection with the referenced matter through October 31, 2016 — $267.50

[redacted]

RE: Breitling, Samuel G. and Jo Ann

[redacted]

DATE	ATTY	DESCRIPTION	HOURS	VALUE
10/04/16	JLS	Review/analyze reply in support of motion for new trial; [redacted]; review/analyze order denying motion for new trial; [redacted].	0.20	85.00
[redacted]				
10/20/16	JLS	[redacted] oder denying motion to alter or amend.	0.10	42.50
[redacted]				
		TOTAL HOURS	**0.70**	

TOTAL FEES — **$267.50**

TOTAL BALANCE DUE — **$267.50**

[redacted]

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

November 7, 2016
Invoice No.: 1279247

REMITTANCE ADVICE

Total amount due for the legal fees and expenses rendered in connection with the referenced matter through October 31, 2016

[redacted]
RE: Breitling, Samuel G. and Jo Ann

Total Fees $267.50

Total Due this Statement $267.50

REMITTANCE

[redacted]

Locke Lord LLP
Attorneys & Counselors

[redacted]
7195 Dallas Parkway
Plano, TX 75024

December 15, 2016
Invoice No.: 1291645

Total amount due for the legal services rendered and expenses incurred in connection with the referenced matter through November 30, 2016 — $4,470.43

[redacted]
RE: Breitling, Samuel G. and Jo Ann

[redacted]

DATE	ATTY	DESCRIPTION	HOURS	VALUE
[redacted]				
11/08/16	JLS	Begin to review motion for rehearing; [redacted]	0.30	127.50
[redacted]				

Invoice Date: December [illegible] 2016
Invoice No.: 1291645
Page: 2

DATE	ATTY	DESCRIPTION	HOURS	VALUE
[redacted]				

TOTAL HOURS 11.50

TOTAL FEES $4,379.10

DATE	EXPENSES	VALUE
	[redacted]	
	TOTAL EXPENSES	$91.33

TOTAL FEES	$4,379.10
TOTAL EXPENSES	$91.33
TOTAL FEES AND EXPENSES	$4,470.43
TOTAL BALANCE DUE	**$4,470.43**

[redacted]

Locke Lord LLP

Attorneys & Counselors

[redacted]

7195 Dallas Parkway
Plano, TX 75024

December 15, 2016
Invoice No.: 1291645

REMITTANCE ADVICE

Total amount due for the legal fees and expenses rendered in connection with the referenced matter through November 30, 2016

[redacted]

RE: Breitling, Samuel G. and Jo Ann

Total Fees $4,379.10

Total Expenses $91.33

Total Due this Statement $4,470.43

REMITTANCE

[redacted]